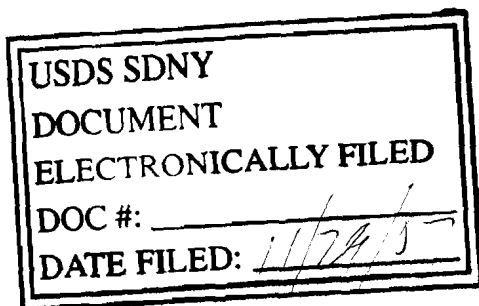


*Koefly, T*



UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

CHESTER TSANG, On Behalf of Himself and )  
All Others Similarly Situated, )

Plaintiff, )

vs. )

LDK SOLAR CO., LTD., et al., )

Defendants. )

No. 07 Civ. 8706 *JGK*)

CLASS ACTION

**STIPULATION AND PROPOSED ORDER FOR TRANSFER AND CONSOLIDATION**

WHEREAS, Chester Tsang instituted a securities class action lawsuit on behalf of the stockholders of LDK Solar Co. Ltd. ("LDK") in this Court on October 9, 2007;

WHEREAS, the District Court for the Northern District of California consolidated three related securities class action lawsuits instituted on behalf of the stockholders of LDK Solar Co. Ltd. ("LDK") in this District on November 7, 2007;

WHEREAS, the parties agree that transfer and consolidation of these related actions will promote judicial economy, avoid duplicative law and motion and discovery proceedings, and streamline adjudication of these related matters;

WHEREAS, a lead plaintiff has not yet been appointed pursuant to 15 U.S.C. §78u-4(a)(3)(B) of the Securities Exchange Act of 1934;

IT IS HEREBY STIPULATED by the parties, through their counsel of record, that:

1. The above-captioned case be dismissed and transferred to the District Court for the Northern District of California;

2. Once the case is transferred, the parties shall stipulate to consolidation under the following provisions:

(a) The transferred action shall be consolidated with In re LDK Solar Securities Litigation, C-07-05182-WHA for all purposes, including pretrial proceedings, trial and appeal, pursuant to Fed. R. Civ. P. 42(a);

(b) The caption of these consolidated cases shall be "*In re LDK Solar Securities Litigation*" and the files of this action shall be maintained in one file under Master File No. C-07-05182-WHA. Any other actions now pending or hereafter filed in the Northern District of California which arise out of the same facts and claims as alleged in these related actions shall be consolidated for all purposes, if and when they are brought before the Northern District of California and the Northern District of California accepts the transfer and approves consolidation;

(c) Without waiving any challenges to jurisdiction or venue, LDK, through their counsel of record indicated below, agree to waive process of service;

(d) Every pleading filed in the consolidated actions, or in any separate action included herein, shall bear the following caption:

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE LDK SOLAR SECURITIES LITIGATION	)	Master File No. C-07-05182- WHA
	)	
This Document Relates to:	)	
	)	
	)	<u>CLASS ACTION</u>
	)	

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(e) When a pleading is intended to apply to all actions governed by the consolidation order, the words "All Actions" shall appear immediately after the words "This Document Relates to:" in the caption set out above. When a pleading is intended to apply only to some, but not all of the consolidated actions, the Northern District of California's docket number for the individual action to which the document applies along with the last name of the first-listed plaintiff in said action shall appear immediately after the words "This Document Relates to:" in the caption described above;

(f) Following entry of the consolidation order, the parties shall comply with 15 U.S.C. §78u-4(b)(3)(C)(i), without regard to whether a stay under 15 U.S.C. §78u-4(b)(3)(B) is in effect, and shall comply with 15 U.S.C. §78u-4(b)(3)(C)(i) provisions concerning documents, including, but not limited to, electronic documents and e-mail, relevant to allegations contained in any and all of the pleadings in these actions, including any consolidated class action complaint;

(g) Within 20 days of the appointment of a lead plaintiff and lead counsel in the consolidated action, lead plaintiff shall designate one of the complaints operative or establish a schedule for filing a consolidated complaint which shall be the operative complaint and which shall supersede all previously filed complaints. Defendants need not respond to any preceding complaints. Lead plaintiff and defendants shall also negotiate a briefing schedule on defendants' anticipated motion to dismiss the operative complaint;

(h) The parties shall effect service of papers filed with the Northern District of California on opposing counsel by overnight mail service, hand delivery, or facsimile, unless otherwise agreed. After the Court appoints lead plaintiff's counsel, defendants may serve all plaintiffs' counsel who are not appointed as lead counsel by regular mail, but must continue to serve lead plaintiff's counsel by overnight mail service, hand delivery, or facsimile.

IT IS SO STIPULATED.

DATED: November 20, 2007

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Attorney for Plaintiff Chester Tsang

DATED: November \_\_, 2007

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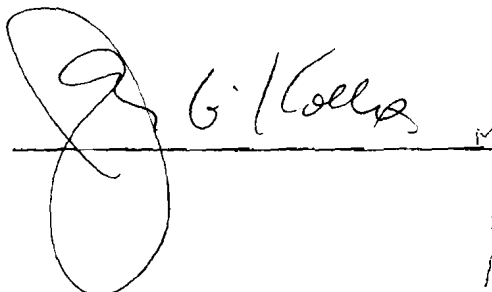
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Attorneys for Defendant LDK Solar Co., Ltd.

**ORDER**

IT IS SO ORDERED.

DATED: 11/28/07



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